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October 27, 2023

VIA ECF

Hon. Peter G. Sheridan, U.S.D.J.
United States District Court
402 East State Street
Trenton, NJ 08608

Re: *Association of New Jersey Rifle & Pistol Clubs,
Inc. et al. v. Platkin et al. ("ANJRPC")*
Docket No. 3:18-cv-10507
Cheeseman et al. v. Platkin et al.
Docket No. 1:22-cv-04360
Ellman et al. v. Platkin et al.
Docket No. 3:22-cv-04397

Dear Judge Sheridan:

This office represents State Defendants¹ in the above-captioned consolidated matters. By order dated September 6, 2023 (*see ANJRPC*, ECF Nos. 166-167), the Court adopted the parties' proposed scheduling order for summary judgment and *Daubert* motions. Included in the schedule was a provision allowing a party to request extended brief page length, seven days prior to filing, after meeting and conferring with all parties.

¹ That is, the Attorney General of New Jersey and Superintendent of the New Jersey Division of State Police as to all three matters; and additionally the Camden County Prosecutor and Ocean County Prosecutor in the *Cheeseman* matter only.



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Accordingly, State Defendants hereby request leave to file a brief of up to 60 pages for their affirmative *Daubert* motion. They also request leave to file a brief of up to 80 pages for their cross-motion for summary judgment.

Plaintiffs in all three matters have consented to this request.

This request is necessary due to the number and complexity of the issues involved in these three consolidated actions. Specifically, the State's *Daubert* motion is anticipated to address multiple Plaintiffs' experts. Further, that brief will be addressing not only the State's *Daubert* arguments, but also its arguments in support of striking supplemental expert discovery materials, as was recently addressed by the Court including in its September 28, 2023 text order (*see ANJRPC*, ECF Nos. 169-171). The State's cross-motion for summary judgment, meanwhile, will be addressing all of its affirmative arguments for three separate lawsuits, as well as addressing arguments raised in the summary judgment motions already filed by the three sets of Plaintiffs.

The issues presented in these matters are significant. It is why the *ANJRPC* and *Ellman* Plaintiffs had previously requested overlength briefs for their summary judgment and *Daubert* motions, to which State Defendants consented, and which the Court granted. For the above reasons, State Defendants' requests should now also be granted.

Thank you for the Court's consideration.

Respectfully submitted,

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By: /s/ Daniel M. Vannella
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cc: All counsel of record (via ECF)